

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF RHODE ISLAND

UNITED STATES OF AMERICA

v.

THOMAS GOODMAN

Cr. No. 18-141 JJM-LDA

In violation of 18 U.S.C. §§ 2251(a) and
§ 2252(a)(4)(B)

INFORMATION

The United States Attorney charges that:

COUNT ONE

(Sexual Exploitation of a Minor)

On or about December 19, 2007, in the District of Rhode Island, the defendant,

THOMAS GOODMAN,

did employ, use, persuade, induce, entice, and coerce a minor, to wit: Minor Victim #1, a minor child, to engage in sexually explicit conduct for the purpose of producing any visual depiction of such conduct, knowing and having reason to know that such visual depiction would be transported or transmitted using any means and facility of interstate and foreign commerce, knowing and having reason to know that such visual depiction would be transported or transmitted in and affecting interstate or foreign commerce, and which visual depiction was produced or transmitted using materials that have been mailed, shipped, and transported in and affecting interstate and foreign commerce by any means, including by computer.

All in violation of Title 18 United States Code Section 2251(a).

COUNT TWO

(Sexual Exploitation of a Minor)

On or about April 20, 2013, in the District of Rhode Island, the defendant,

THOMAS GOODMAN,

did employ, use, persuade, induce, entice, and coerce a minor, to wit: Minor Victim #1, a minor child, to engage in sexually explicit conduct for the purpose of producing any visual depiction of such conduct, knowing and having reason to know that such visual depiction would be transported or transmitted using any means and facility of interstate and foreign commerce, knowing and having reason to know that such visual depiction would be transported or transmitted in and affecting interstate or foreign commerce, and which visual depiction was produced or transmitted using materials that have been mailed, shipped, and transported in and affecting interstate and foreign commerce by any means, including by computer.

All in violation of Title 18 United States Code Section 2251(a).

COUNT THREE

(Sexual Exploitation of a Minor)

On or about December 19, 2007, in the District of Rhode Island, the defendant,

THOMAS GOODMAN,

did employ, use, persuade, induce, entice, and coerce a minor, to wit: Minor Victim #2, a minor child, to engage in sexually explicit conduct for the purpose of producing any visual depiction of such conduct, knowing and having reason to know that such visual

depiction would be transported or transmitted using any means and facility of interstate and foreign commerce, knowing and having reason to know that such visual depiction would be transported or transmitted in and affecting interstate or foreign commerce, and which visual depiction was produced or transmitted using materials that have been mailed, shipped, and transported in and affecting interstate and foreign commerce by any means, including by computer.

All in violation of Title 18 United States Code Section 2251(a).

COUNT FOUR

(Sexual Exploitation of a Minor)

On or about June 9, 2010, in the District of Rhode Island, the defendant,

THOMAS GOODMAN,

did employ, use, persuade, induce, entice, and coerce a minor, to wit: Minor Victim #2, a minor child, to engage in sexually explicit conduct for the purpose of producing any visual depiction of such conduct, knowing and having reason to know that such visual depiction would be transported or transmitted using any means and facility of interstate and foreign commerce, knowing and having reason to know that such visual depiction would be transported or transmitted in and affecting interstate or foreign commerce, and which visual depiction was produced or transmitted using materials that have been mailed, shipped, and transported in and affecting interstate and foreign commerce by any means, including by computer.

All in violation of Title 18 United States Code Section 2251(a).

COUNT FIVE

(Sexual Exploitation of a Minor)

On or about October 8, 2016, in the District of Rhode Island, the defendant,

THOMAS GOODMAN,

did employ, use, persuade, induce, entice, and coerce a minor, to wit: Minor Victim #3, a minor child, to engage in sexually explicit conduct for the purpose of producing any visual depiction of such conduct, knowing and having reason to know that such visual depiction would be transported or transmitted using any means and facility of interstate and foreign commerce, knowing and having reason to know that such visual depiction would be transported or transmitted in and affecting interstate or foreign commerce, and which visual depiction was produced or transmitted using materials that have been mailed, shipped, and transported in and affecting interstate and foreign commerce by any means, including by computer.

All in violation of Title 18 United States Code Section 2251(a).

COUNT SIX

(Sexual Exploitation of a Minor)

On or about September 23, 2017, in the District of Rhode Island, the defendant,

THOMAS GOODMAN,

did employ, use, persuade, induce, entice, and coerce a minor, to wit: Minor Victim #3, a minor child, to engage in sexually explicit conduct for the purpose of producing any visual depiction of such conduct, knowing and having reason to know that such visual

depiction would be transported or transmitted using any means and facility of interstate and foreign commerce, knowing and having reason to know that such visual depiction would be transported or transmitted in and affecting interstate or foreign commerce, and which visual depiction was produced or transmitted using materials that have been mailed, shipped, and transported in and affecting interstate and foreign commerce by any means, including by computer.

All in violation of Title 18 United States Code Section 2251(a).

COUNT SEVEN

(Sexual Exploitation of a Minor)

On or about June 20, 2010, in the District of Rhode Island, the defendant,

THOMAS GOODMAN,

did employ, use, persuade, induce, entice, and coerce a minor, to wit: Minor Victim #4, a minor child, to engage in sexually explicit conduct for the purpose of producing any visual depiction of such conduct, knowing and having reason to know that such visual depiction would be transported or transmitted using any means and facility of interstate and foreign commerce, knowing and having reason to know that such visual depiction would be transported or transmitted in and affecting interstate or foreign commerce, and which visual depiction was produced or transmitted using materials that have been mailed, shipped, and transported in and affecting interstate and foreign commerce by any means, including by computer.

All in violation of Title 18 United States Code Section 2251(a).

COUNT EIGHT

(Sexual Exploitation of a Minor)

On or about August 8, 2010, in the District of Rhode Island, the defendant,

THOMAS GOODMAN,

did employ, use, persuade, induce, entice, and coerce a minor, to wit: Minor Victim #4, a minor child, to engage in sexually explicit conduct for the purpose of producing any visual depiction of such conduct, knowing and having reason to know that such visual depiction would be transported or transmitted using any means and facility of interstate and foreign commerce, knowing and having reason to know that such visual depiction would be transported or transmitted in and affecting interstate or foreign commerce, and which visual depiction was produced or transmitted using materials that have been mailed, shipped, and transported in and affecting interstate and foreign commerce by any means, including by computer.

All in violation of Title 18 United States Code Section 2251(a).

COUNT NINE

(Possession of Child Pornography)

On or about May 24, 2018, in the District of Rhode Island, defendant,

THOMAS GOODMAN,


did knowingly possess one or more books, magazines, periodicals, films, videotapes and other matter which contained visual depictions of minors engaged in sexually explicit conduct that had been transported using any means or facility of interstate or foreign commerce,


In violation of 18 U.S.C. § 2252(a)(4)(B) and (b)(2).

FORFEITURE ALLEGATION

Pursuant to Federal Rule of Criminal Procedure 32.2, notice is hereby given to defendant THOMAS GOODMAN, that in the event the defendant is convicted of this Indictment, the defendant shall forfeit to the United States, pursuant to Title 18, United States Code, Section 2253(a), all property, real or personal, used or intended to be used to commit or facilitate the commission of the offense of conviction.

STEPHEN G. DAMBRUCH
United States Attorney

By: 
LEE H. VILKER
Assistant U.S. Attorney


SANDRA R. HEBERT
Deputy Criminal Chief

Date: 10/4/18